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14 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 CITY OF COLFAX,

17 Petitioner,
18 v.
19 STATIONARY ENGINEERS LOCAL 39
20 HEALTH & WELFARE TRUST FUND,
21 Respondent.

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No. C 12-00281 MMC
**STIPULATION TO CONTINUE ALL
DATES RELATING TO
RESPONDENT'S MOTION FOR
ATTORNEYS' FEES; [PROPOSED]
ORDER**

CITY OF COLFAX,

22 Petitioner,
23 v.
24 STATIONARY ENGINEERS LOCAL 39
25 HEALTH & WELFARE TRUST FUND,
26 Respondent.

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No. C 12-00562 MMC

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STIPULATION TO CONTINUE ALL HEARING DATES RELATING TO MOTION FOR ATTORNEYS'
FEES; [PROPOSED] ORDER; CASE NOS. C 12-00281 MMC AND C 12-00562 MMC

1 Pursuant to Federal Rules of Civil Procedure 54, and Civil Local Rules 54-5 and 6-2, the
 2 Parties to the above-captioned matters, by and through the undersigned counsel, hereby stipulate
 3 to continue all dates relating to the motion for attorneys' fees filed by Respondent Stationary
 4 Engineers Local 39 Health and Welfare Trust Fund ("Trust Fund"), currently scheduled for June
 5 15, 2012, to allow the parties time to finalize a settlement, obtain approval of the Parties'
 6 respective governing boards and execute all necessary settlement documents. The City Council
 7 for the Petitioner City of Colfax will consider the proposed settlement at either its May 23, 2012
 8 or June 13, 2012 meeting, depending upon when the Parties complete the necessary settlement
 9 documents. It is anticipated that the settlement will be finalized by June 30, 2012.

10 In light of the foregoing, the Parties stipulate to: (1) continue the hearing on the
 11 Respondent Trust Fund's motion for attorneys for at least 40 days to July 27, 2012; (2) continue
 12 the deadline to file the Petitioner City of Colfax's opposition papers to fourteen calendar days
 13 prior to said hearing date; and (c) continue the deadline to file the Respondent Trust Fund's reply
 14 papers to seven calendar days prior to said hearing date.

15 With this stipulation, the Parties respectfully request that the Court: (1) continue the June
 16 15, 2012 hearing date on Respondent's motions for attorneys' fee consistent with the above
 17 stipulation; (2) extend the deadline for the Petitioner City of Colfax to file its opposition papers to
 18 fourteen calendar days prior to said hearing date; and (c) extend the deadline for the Respondent
 19 Trust Fund to file its reply papers to seven calendar days prior to said hearing date.

20 Dated: May 17, 2012

WEINBERG, ROGER & ROSENFELD
 A Professional Corporation

22 By: /s/ Linda Baldwin Jones
 23 LINDA BALDWIN JONES
 Attorneys for Respondent

24 Dated: May 17, 2012

WILEY PRICE RADULOVICH, LLP

26 By: /s/ Monna R. Radulovich
 27 MONNA R. RADULOVICH
 Attorneys for Petitioner

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED, and the hearing on the motion for attorneys fees is continued to July 27, 2012, with the exception that the deadline for the Respondent Trust Fund to file its reply papers is extended only to July 13, 2012.

Dated: May 18, 2012

Maxine M. Chesney
HONORABLE MAXINE M. CHESNEY
UNITED STATES DISTRICT COURT JUDGE

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